

## Knittel, Janette

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**From:** Tasya Gray <ngray@dofnw.com>  
**Sent:** Friday, July 10, 2020 4:39 PM  
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**Subject:** Former Rhone Poulenc Site June Monthly Progress Report  
**Attachments:** 20200710\_Monthly Progress Report\_June 2020.pdf

Hello Janette,  
Please find the June monthly progress report for the Former Rhone Poulenc Site attached.  
Have a good weekend,  
Tasya

*Tasya Gray, LG*

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July 10, 2020

Ms. Janette Knittel  
EPA Region 10/AWT-150  
EPA Project Coordinator  
1200 Sixth Avenue, 15-D13  
Seattle, WA 98101

**Subject: Monthly Progress Report – June 2020**  
Former Rhone-Poulenc Facility  
9229 East Marginal Way South  
Tukwila, WA 98108

Dalton, Olmsted, & Fuglevand, Inc. (DOF) prepared this progress report on behalf of the Respondents. This report summarizes pertinent, implemented, and planned Resource Conservation and Recovery Act corrective action activities at the former Rhone-Poulenc, Inc., facility located on East Marginal Way South in Tukwila, Washington. This document is being transmitted to fulfill the monthly progress reporting requirement in the U.S. Environmental Protection Agency (EPA) Region 10 Administrative Order on Consent No. 1091-11-20-3008(h) (the Order).

#### ACTIVITIES COMPLETED OR IN PROGRESS FOR THIS REPORTING PERIOD

##### **Project Coordinator**

On June 16, 2020 notification was provided to EPA regarding a change in the Respondents' designated Project Coordinator. Natasya Gray, Licensed Geologist of DOF, is the Respondents' new designated Project Coordinator. Consistent with Section XIII of the Order, Ms. Gray and DOF will be overseeing Order-related tasks moving forward.

##### **Progress Report**

The May 2020 monthly progress report required under the Order was delivered to EPA on June 10, 2020 via email by Wood Environment & Infrastructure Solutions, Inc. (Wood). Due to office closures related to the COVID-19 pandemic hard copy distribution was postponed and will be sent with the hard copies of this June 2020 report.

##### **King County Self-Monitoring Sampling and Reporting**

The second quarter self-monitoring samples were collected on June 2, 2020 by Wood and results were within the King County discharge permit requirements. The second quarter self-monitoring report will be sent to King County on July 10, 2020.

##### **Interim and Corrective Measures**

This section summarizes key activities performed related to implementation of the hydraulic control interim measure (HCIM).

##### Performance Monitoring

Performance monitoring tasks included:

- A groundwater sample was collected by Wood from extraction well EX-3 on June 2, 2020;
- Water level records were downloaded from the level-logging transducers installed in MW-47, MW-51, MW-52, and MW-53;
- Manual water level measurements were recorded from wells across the site; and
- Quarterly inspections were performed on June 30, 2020.

Figures 1 through 3 show the toluene, arsenic, and copper concentrations from EX-3 over time. Figures 4 through 6 show water level data trends. The figures are included as an attachment to this report. During the quarterly inspection, asphalt repair markings were observed around areas of deteriorated asphalt and the pre-treatment system autodialer was found to be malfunctioning.

### Hydraulic Control

The pre-treatment system operated under automatic control from June 1 to June 30, 2020. Water level data was downloaded from both the data recorder and the programmable logic controller (PLC) on July 1, 2020.

The differential between 72-hour averaged water levels in wells DM-8 and MW-49 was maintained at more than 1-foot from June 1 to June 30th and was approximately 2.15 feet at the end of June. We will continue to report flow using the totalized flow from the individual extractions wells due to a slight undercount of flow observed when relying on the effluent flow meter, as previously reported.

### **Corrective Measures Study**

The Agency Draft Corrective Measures Study (CMS) Work Plan was delivered to EPA on September 2, 2014.

The CO<sub>2</sub> Neutralization Pilot Study results report was submitted to EPA on May 15, 2020.

### **Other Activities**

Sediment sampling commenced in late June within the boundaries of the Former Rhone-Poulenc RCRA Site as part of the Lower Duwamish Waterway Superfund Site Pre-Design Studies.

### **Activities Planned for the Next Reporting Period**

Various activities associated with the facility will continue during the next reporting period. During July 2020, the Respondents plan to:

- Continue regularly scheduled operations and maintenance activities associated with the HCIM;
- Implement asphalt repairs;
- Repair the pre-treatment system autodialer phone line; and
- Meet with EPA regarding next steps on the CMS Work Plan.

On behalf of the Respondents, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designated to evaluate the information submitted. I certify that the information contained in or accompanying this report, Monthly Progress Report – June 2020, is true, accurate, and complete. As to those portions of the report for which I cannot personally verify accuracy, I certify under penalty of law that this report and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on

my inquiry of the person or persons who may manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By: Natasya AD Gray Date: July 10, 2020  
Natasya Gray, Project Coordinator

Attachments: Figure 1 Toluene Concentration Trend for Extraction Well EX-3  
Figure 2 Arsenic Concentration Trend for Extraction Well EX-3  
Figure 3 Copper Concentration Trend for Extraction Well EX-3  
Figure 4 2020 Groundwater Elevations: DM-8, MW-49, and MW-47  
Figure 5 2020 Groundwater Elevations: DM-8, MW-49, and MW-53  
Figure 6 2020 Groundwater Elevations: DM-8, MW-49, MW-51, and MW-52

cc: Jennifer MacDonald, EPA  
Lee Thomas, EPA  
Li Ma, Ecology  
Aaron King, USACE  
David Blount, LLB  
Jeff Davis, Container Properties  
Paul Linskey, Rhodia













